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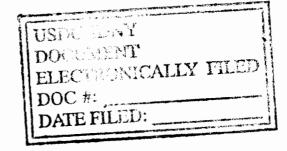
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SECRETARY PAMELA PYLANT

VIA FACSIMILE (2)14-390-4170)

July 28, 2008

Hon. William C. Conner United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601



Morgan v. Local # 417, Intl. Assn. of Bridge, Structural and Reinforcing Re:

<u>Ironworkers</u>; 07 Civ. 6229 (WCC)

Dear Judge Conner:

We represent plaintiff in this case. After conferring with defendant's counsel, and with consent of same, I write to respectfully request that the summary judgment briefing schedule be adjourned to allow for completion of paper discovery. We completed defendant depositions last week, but have a discovery dispute which we will attempt to resolve between counsel and, if not fully successful, with the Court's intervention if necessary.

We believe that the following revised briefing schedule should allow adequate time to resolve the outstanding discovery issues:

Defendant's Moving Papers:

Oct. 17, 2008 Nov. 7, 2008

Plaintiff's Opposition: Defendant's Reply:

November 21, 2008

Thank you for Your Honor's consideration of this request.

cc: Denis A. Engel, Esq. (Via Fax @ 516-742-1765)

Request GRANTED. So Ordered Dated: White Plains, NY July 30, 2008

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